

**DIRECT TESTIMONY**

**of**

**Joan Howard  
Consumer Policy Analyst**

**Consumer Services Division  
Illinois Commerce Commission**

**Reconciliation of revenues collected under Rider UF (Uncollectible Factors  
Rider) with uncollectible costs incurred**

**Commonwealth Edison Company**

**Docket No. 12-0505**

**March 1, 2013**

1   **Q.    Please state your name and business address.**

2    A.    My name is Joan Howard. My business address is 527 East Capitol  
3        Avenue, Springfield, Illinois 62701.

4

5   **Q.    By whom are you employed and in what capacity?**

6    A.    I am employed by the Illinois Commerce Commission (“Commission”) as  
7        a Consumer Policy Analyst in the Consumer Services Division. My  
8        responsibilities include development of rules and policies pertaining to  
9        consumer protection and consumer billing and payment practices; review  
10       of utility policies and practices; review of tariff filings, assisting division  
11       management in identifying and resolving consumer complaint trends; and  
12       evaluation of data recorded in the Division’s complaint tracking system.

13

14   **Q.    What is the purpose of your testimony in this proceeding?**

15   A.    The purpose of my testimony is to report the results of my review of the  
16        prudence and reasonableness of the actions of Commonwealth Edison  
17        Company (“ComEd” or the “Company”) to pursue minimization and  
18        collection of collectibles during the reconciliation period, June 1, 2011  
19        through May 21, 2012, of Rider UF, Uncollectible Factors Rider (“Rider  
20        UF”) and to make any recommended determinations for the Commission  
21        to make regarding adjustments to practices pursuant to the requirements  
22        of Section 16-111.8(c).

23

24 **Q. Are you sponsoring any schedules as part of your direct testimony?**

25 A. No.

26

27 **Q. What is the result of your review of the prudence and**  
28 **reasonableness of the Company's actions to pursue minimization**  
29 **and collection of collectibles during the period, June 1, 2011 through**  
30 **May 21, 2012, pursuant to Section 16-111.8(c) of the Act?**

31 A. Upon reviewing the testimony of Company witness William B. DeLoach,  
32 concerning the Company's response to the Act's requirement that a utility  
33 with a tariff authorized by Section 16 -111.8(c) pursue minimization of and  
34 collection of uncollectibles through a list of six activities (ComEd Ex. 3.0,  
35 pp. 10-20), the Company's actions in this regard generally appear to be  
36 prudent and reasonable. In summary, as required by Section 16-111.8(c),  
37 ComEd's actions include (1) identifying customers with late payments; (2)  
38 contacting the customers in an effort to obtain payment; (3) providing  
39 delinquent customers with information about possible payment options; (4)  
40 serving disconnection notices; (5) implementing disconnections based on  
41 the level of uncollectibles; and (6) pursuing collection activities based on  
42 the level of uncollectibles.

43

44 **Q. Do you have recommended determinations for the Commission to**  
45 **make regarding adjustments to ComEd's implementation of**  
46 **practices required by Section 16-111.8(c)?**

47 A. I do not have any recommended determinations for the Commission to  
48 consider regarding the Company's minimization of uncollectibles and  
49 collection of uncollectibles.

50  
51 **Q. Do you have any other observations to make?**

52 A. Yes, with regard to the description of ComEd's actions pertaining to  
53 serving disconnection notices, Mr. DeLoach does not address the  
54 Company's practice with respect to customers who are not eligible for  
55 disconnection of service during the winter heating season. Electric and  
56 gas public utilities are prohibited from disconnecting service to any  
57 residential customer who is a participant under Section 6 of the Energy  
58 Assistance Act of 1989 for nonpayment during the period from December  
59 1 through and including March 31 of the immediately succeeding calendar  
60 year. Electric and gas public utilities are prohibited from disconnecting  
61 service to certain military personnel in military service. ComEd is  
62 prohibited from disconnecting service to a residential space-heating  
63 customer for non-payment from December 1 through March 31. It is my  
64 understanding that ComEd does not disconnect electric service to the  
65 above specified customers during times when disconnection is prohibited.

66 A final notice prior to disconnection of service sent to a customer who is  
67 not eligible for disconnection during the particular time covered by the  
68 notice would not be acted upon by the utility. However, I believe it is  
69 appropriate for the Company to issue other forms of notice of non-  
70 payment that do not warn of imminent disconnection of service during  
71 periods of time when the Company is prohibited from disconnecting  
72 service for nonpayment.

73

74 **Q. Does this conclude your prepared direct testimony?**

75 A. Yes, it does.